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4 Attorney for Defendant GOONAN

5 IN THE UNITED STATES DISTRICT COURT  
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
7 OAKLAND DIVISION

8  
9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 vs.  
12 CASEY ROBERT GOONAN,  
13 Defendant

Case No.: 4:24-cr-00414 JSW

STIPULATION AND [PROPOSED] ORDER  
CONTINUING SENTENCING HEARING

Re: Dkt. No. 26

14 The defendant, by and through his counsel, Sarah Potter, and the United States, by and  
15 through its counsel, Assistant U.S. Attorney Nikhil Bhagat, hereby move the Court to continue  
16 the date of the defendant's sentencing hearing until June 10, 2025 at 1:00 p.m. The probation  
17 officer, Pepper Friesen, has requested additional time to complete the presentence report due to  
18 the defendant's unavailability to be interviewed because he was placed in medical isolation as a  
19 result of an infection. In addition, the defendant requires additional time to receive necessary  
20 medical and psychiatric records that have been requested. As the defendant has pled guilty there  
21 are no Speedy Trial Act concerns implicated by this continuance. The probation officer has  
22 confirmed her availability on the requested date for sentencing. Accordingly, the parties hereby  
23 ask the Court to continue the matter until June 10, 2025 at 1:00 p.m. for sentencing.

24 STIPULATION AND [PROPOSED] ORDER CONTINUING SENTENCING HEARING - 1

1 Dated: February 28, 2025

/s/

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2 SARAH POTTER  
3 Attorney for Defendant Goonan

4 Dated: February 28, 2025

5 PATRICK D. ROBBINS  
6 Acting United States Attorney

/s/

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7 NIKHIL BHAGAT  
8 Assistant United States Attorney

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24 STIPULATION AND ~~PROPOSED~~ ORDER CONTINUING SENTENCING HEARING - 2

## **[PROPOSED] ORDER**

Good cause having been shown and by Stipulation of the parties herein,

IT IS HEREBY ORDERED that defendant Casey Goonan's sentencing hearing be

continued to June 10, 2025 at 1:00 p.m.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 3, 2025

HON. JEFFREY S. WHITE  
United States District Court